

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ANDREW CORZO, SIA HENRY, ALEXANDER LEO-  
GUERRA, MICHAEL MAERLENDER, BRANDON  
PIYEVSKY, BENJAMIN SHUMATE, BRITTANY  
TATIANA WEAVER, and CAMERON WILLIAMS,  
individually and on behalf of all others similarly situated,  
*Plaintiffs,*

v.

BROWN UNIVERSITY, CALIFORNIA INSTITUTE  
OF TECHNOLOGY, UNIVERSITY OF CHICAGO,  
THE TRUSTEES OF COLUMBIA UNIVERSITY IN  
THE CITY OF NEW YORK, CORNELL  
UNIVERSITY, TRUSTEES OF DARTMOUTH  
COLLEGE, DUKE UNIVERSITY, EMORY  
UNIVERSITY, GEORGETOWN UNIVERSITY, THE  
JOHNS HOPKINS UNIVERSITY, MASSACHUSETTS  
INSTITUTE OF TECHNOLOGY, NORTHWESTERN  
UNIVERSITY, UNIVERSITY OF NOTRE DAME DU  
LAC, THE TRUSTEES OF THE UNIVERSITY OF  
PENNSYLVANIA, WILLIAM MARSH RICE  
UNIVERSITY, VANDERBILT UNIVERSITY, and  
YALE UNIVERSITY,  
*Defendants.*

Case No. 1:22-cv-00125

Hon. Matthew F. Kennelly

**DEFENDANTS' MOTION TO CERTIFY  
THE COURT'S SUMMARY JUDGMENT ORDER FOR  
INTERLOCUTORY APPEAL UNDER 28 U.S.C. § 1292(b)**

Defendants, by and through undersigned counsel, respectfully move to certify the Court's January 12, 2026 summary judgment order (Dkt. 1210) under 28 U.S.C. § 1292(b). Defendants move to certify two questions for interlocutory review regarding (1) the applicability of the discovery rule to plaintiffs' antitrust claims and (2) whether plaintiffs who did not pay for their tuition have suffered antitrust injury. The grounds supporting this request are set forth in defendants' memorandum of law which is being filed simultaneously herewith.

Dated: January 27, 2026

Respectfully submitted,

By: /s/ David Gringer

David Gringer  
Alan Schoenfeld  
Wilmer Cutler Pickering Hale  
and Dorr LLP  
7 World Trade Center  
250 Greenwich Street  
New York, NY 10007  
Tel: 212-937-7294  
david.gringer@wilmerhale.com  
alan.schoenfeld@wilmerhale.com

Seth Waxman  
Wilmer Cutler Pickering Hale  
and Dorr LLP  
2100 Pennsylvania Avenue NW  
Washington, DC 20037  
Tel: 202-663-6800  
seth.waxman@wilmerhale.com

Edward W. Feldman  
Daniel Martin Feeney  
Miller Shakman Levine &  
Feldman LLP  
30 W. Monroe St.  
Suite 1900  
Chicago, IL 60603  
Tel.: 312-263-3700  
dfeeney@millershakman.com  
efeldman@millershakman.com

*Counsel for The Trustees of the University  
of Pennsylvania*

By: /s/ Norman Armstrong

Norman Armstrong  
Kirkland & Ellis LLP  
1301 Pennsylvania Avenue, NW  
Washington, D.C. 20004  
Tel.: 202-389-5000  
norman.armstrong@kirkland.com

Daniel E. Laytin  
Kirkland & Ellis LLP  
333 West Wolf Point Plaza  
Chicago, IL 60654  
Tel.: 312-862-2000  
daniel.laytin@kirkland.com

*Counsel for Defendant Cornell University*

By: /s/ Britt M. Miller

Britt M. Miller  
Daniel T. Fenske  
Mayer Brown LLP  
71 South Wacker Drive  
Chicago, IL 60606  
Tel: 312-782-0600  
bmiller@mayerbrown.com  
dfenske@mayerbrown.com

*Counsel for Defendant Georgetown  
University*

By: /s/ Eric Mahr

Eric Mahr  
Jan Rybnicek  
Andrew Henderson  
Freshfields US LLP  
700 13th Street, NW  
Washington, DC 20005  
Tel: 202-777-4500  
eric.mahr@freshfields.com  
jan.rybnicek@freshfields.com  
andrew.henderson@freshfields.com

Rami Fakhouri  
Jennifer L. Greenblatt  
Goldman Ismail Tomaselli Brennan & Baum  
LLP  
191 North Wacker Drive, Suite 3000  
Chicago, IL 60604  
Tel: (312) 681-6000  
rfakhouri@goldmanismail.com  
jgreenblatt@goldmanismail.com

*Counsel for Massachusetts Institute of  
Technology*

By: /s/ Robert A. Van Kirk

Robert A. Van Kirk  
Jonathan Pitt  
Sarah F. Kirkpatrick  
Matthew D. Heins  
Feyilana Lawoyin  
Cole T. Wintheiser  
William J. Donnelly  
Williams & Connolly LLP  
680 Maine Ave. SW  
Washington, D.C. 20024  
Tel: 202-434-5000  
rvankirk@wc.com  
jpitt@wc.com  
skirkpatrick@wc.com  
mheins@wc.com  
flawoyin@wc.com  
cwintheiser@wc.com  
wdonnelly@wc.com

James Peter Fieweger  
Michael Best & Friedrich LLP  
444 West Lake Street  
Suite 3200  
Chicago, IL 60606  
Tel.: 312-222-0800  
jpfieweger@michaelbest.com

*Counsel for University of Notre Dame*